

Exhibit BB:
Declaration of Terre Marshall

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

Jeanne Voltz-Loomis; Gary Zachariah)	
Thomas; Denise Edgar; Brandon Moore;)	C/A No.: 5:20-cv-01533-DCC-KDW
Allen Slaughter; Gay Opel Stanley; Brison)	
Akeem Allison; Protection & Advocacy for)	
People with Disabilities, Inc., John Does 1)	
Through 10; Jane Roes 1 through 10; on)	
<i>Their own and on behalf of a class of</i>)	
<i>similarly situated person;</i>)	
Petitioners,)	
)	
v.)	DECLARATION OF TERRE
)	MARSHALL
Henry McMaster, in his official capacity)	
As Governor of the State of South)	
Carolina, et al, BRYAN STIRLING, in his)	
official capacity as Director of the South)	
Carolina Department of Corrections; the)	
SOUTH CAROLINA BOARD OF)	
PARDONS AND PAROLES; and)	
CHRISTOPHER F. GIBBS, MOLLIE)	
DUPRIEST TAYLOR, DAN BATSON,)	
HENRY S. ELDRIDGE, LONNIE)	
RANDOLPH and KIM FREDERICK,)	
in their official capacities as members of)	
the South Carolina Board of Pardons)	
and Paroles.)	
Respondents.)	

I, Terre Marshall, affirm and declare under the penalty of perjury that the following statements are true and correct:

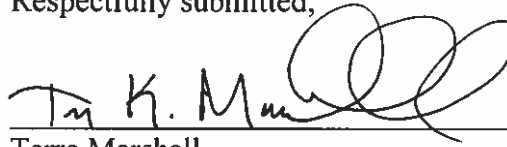
I am employed by the State of South Carolina and the South Carolina Department of Corrections (“SCDC”), an agency of the State of South Carolina. I hold the position of Deputy Director of Health Services within SCDC. I have held the position since December of 2017.

As the Deputy Director of ^{Medical} Health Services within SCDC, I am familiar with the SCDC screening policies for inmates who exhibit symptoms of COVID-19.

I affirm and declare that, when a patient presents with symptoms that indicate the potential presence of the novel coronavirus that causes COVID-19, the SCDC takes the actions set forth in the following documents:

- a. South Carolina Department of Corrections COVID-19 Screening, Testing, and Infection Control Guideline;
- b. Novel Coronavirus (COVID-19) Quarantine Unit Procedures;
- c. Coronavirus Disease 2019 (COVID-19) Inmate Transfer Screening Tool; and
- d. Language for Letter to Families of Patient that Presents with Symptoms of COVID-19.

Respectfully submitted,


Terre Marshall

May 8, 2020

Columbia, South Carolina